



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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FILE:

REPLY TO THE ATTENTION OF:

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SEP 28 1999

Mr. Johnny W. Reising
United States Department of Energy
Feed Materials Production Center
P.O. Box 398705
Cincinnati, Ohio 45239-8705

SRF-5J

RE: Area 2, Phase 2 PSP

Dear Mr. Reising:

The United States Environmental Protection Agency (U.S. EPA) has completed its review of the United States Department of Energy's (U.S. DOE) Project Specific Plan (PSP) for the pre-design sampling in Area 2, Phase 2 (A2,P2) parts two and three, in the southwest portion of the site.

U.S. EPA's comments on the PSP are attached. U.S. DOE must submit responses to comments with (30) thirty days receipt of this letter.

Please contact me at (312) 886-0992 if you have any questions regarding this matter.

Sincerely,

James A. Saric
Remedial Project Manager
Federal Facilities Section
SFD Remedial Response Branch #2

Enclosure

cc: Tom Schneider, OEPA-SWDO
Bill Murphie, U.S. DOE-HDQ
John Bradburne, FERMCO
Terry Hagen, FERMCO
Tom Walsh, FERMCO

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TECHNICAL REVIEW COMMENTS ON
"PROJECT SPECIFIC PLAN FOR PREDESIGN SAMPLING
IN THE AREA 2, PHASE II--PARTS TWO AND THREE"

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENT

Commenting Organization: U.S. EPA Commentor: Saric
Section #: Not applicable (NA) Page #: NA Line #: NA
Original General Comment #: 1

Comment: Figure 2-2 shows that considerable portions of Area 2, Phase II--Parts 2 and 3 are inaccessible for real-time measurement scanning. The text on Page 2-4 in Section 2.3 states that these inaccessible areas will be covered by a separate precertification or certification investigation. The real-time scans are the primary way to identify "hot spots." Many of the inaccessible areas are near the Southern Waste Units area (Area 2, Phase I), where a number of very discrete "hot spots" have been found. Future investigations of these inaccessible areas in Area 2, Phase II must therefore be carefully designed to provide coverage adequate to detect any such "hot spots."

SPECIFIC COMMENT

Commenting Organization: U.S. EPA Commentor: Saric
Section #: 2.2 Page #: 2-1 Line #: 25
Original Specific Comment #: 1

Comment: The text states that areas to be sampled at depth include those that have a topographic difference of more than 6 feet between the elevations measured in 1952 (before site activities began) and the current elevations. The basis for the selection of this difference as a rationale for sampling at depth is not stated. A decrease in elevation from erosion or removal of soil would not warrant subsurface sampling of the site. On the other hand, addition of only a few feet of soil could provide enough shielding to mask a significant radiation source. The rationale for selecting sampling locations at depth should be more fully discussed.